

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

GRAND STRAND WATER & SEWER
AUTHORITY, on behalf of itself and all
others similarly situated,

Plaintiff,

vs.

OLTRIN SOLUTIONS, LLC, JCI JONES
CHEMICALS, INC., and TRINITY
MANUFACTURING, INC.,

Defendants.

Case No. 4:14-CV-2800-RMG

**PLAINTIFF’S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
SETTLEMENT, CERTIFICATION OF SETTLEMENT CLASS, AND
AUTHORIZATION TO DISSEMINATE NOTICE**

PLEASE TAKE NOTICE that Plaintiff Grand Strand Water & Sewer Authority, on behalf of itself and the Settlement Class Members defined in the Settlement Agreement (collectively, “Plaintiffs”), and Defendants Oltrin Solutions, LLC (“Oltrin”), JCI Jones Chemicals, Inc. (“JCI”), and Trinity Manufacturing, Inc. (“Trinity”) have reached a preliminary Settlement, and Plaintiffs hereby move unopposed under Federal Rule of Civil Procedure 23(e) for an Order: (1) preliminarily approving the settlement embodied in the class action Settlement Agreement; (2) certifying the settlement class; and (3) authorizing the dissemination of Notice. In support of this Motion, Plaintiffs rely on the reasons and authorities set forth in their accompanying Memorandum of Law filed contemporaneously herewith and the exhibits thereto. As set forth more fully in the foregoing Memorandum of Law: (1) the proposed Settlement falls within the range of possible approval as fair, reasonable, and adequate; (2) the proposed

Settlement Class meets the requirements of Fed. R. Civ. P. 23(a) and 23(b)(3); and (3) and Plaintiffs' proposed Class Notice Plan is reasonable.

November 23, 2015

Respectfully submitted,

/s/ Henrietta U. Golding

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*Attorneys for Plaintiff Grand Strand Water
Authority and the Proposed Settlement Class*

CERTIFICATE OF SERVICE

I hereby certify that on November 23, 2015, I electronically filed **PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT, CERTIFICATION OF SETTLEMENT CLASS, AND AUTHORIZATION OF DISSEMINATION OF NOTICE** with the Clerk of the Court using the ECF, who in turn sent notice to Counsel of Record.

Dated: November 23, 2015

/s/ Henrietta U. Golding
Henrietta U. Golding